

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY )  
AVERAGE WHOLESALE PRICE )  
LITIGATION ) MDL No. 1456  
                                  ) Civil Action No. 01-12257-PBS  
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**THIS DOCUMENT RELATES TO:**         ) Hon. Patti Saris  
  )  
*United States of America ex rel. Ven-a-Care of*         ) Magistrate Judge Marianne B. Bowler  
*the Florida Keys, Inc. v. Abbott Laboratories*         )  
*Inc., CIVIL ACTION NO. 06-11337-PBS*         )  
  )

**THE UNITED STATES' OPPOSITION TO ABBOTT LABORATORIES INC.'S  
MOTION FOR A PROTECTIVE ORDER RELATING TO THE  
DEPOSITION OF RICHARD A. GONZALEZ**

**EXHIBIT 1**

From: Gobena, Gejaa (CIV)  
Sent: Thursday, June 28, 2007 2:44 PM  
To: 'Jason G. Winchester'  
Subject: Depositions

I understand that the Commonwealth of Pennsylvania has noticed the deposition of several current or former Abbott employees. See attached. Consider this a formal request by the United States under CMO 29 for dates for Messers Hodgson, Dempsey, Gonzalez, Kringle, Karas and Robertson. If the notice dates hold, let us know and we will just cross-notice. Otherwise, we expect you to provide prospective dates by July 12 as per the CMO.

In addition, please provide dates by July 12 for Michael Tootell.

Thanks.